

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	X	

**ORDER GRANTING URGENT MOTION OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR ORDER, UNDER BANKRUPTCY CODE
SECTIONS 105(a) AND 926(a) AND BANKRUPTCY RULE 9006, ESTABLISHING
(I) PROCEDURES WITH RESPECT TO DISCLOSURE OF AVOIDANCE
ACTIONS TO BE ASSERTED BY OVERSIGHT BOARD, AND (II) EXPEDITED
BRIEFING SCHEDULE FOR POTENTIAL REQUEST TO APPOINT TRUSTEE
UNDER BANKRUPTCY CODE SECTION 926(a)**

Upon consideration of the *Urgent Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Code Sections 105(a) and 926(a) and Bankruptcy Rule 9006, Establishing (I) Procedures with Respect to Disclosure of Avoidance Actions to be Asserted by Oversight Board and (II) Expedited Briefing Schedule for Potential Request to Appoint Trustee Under Bankruptcy Code Section 926(a)* (the “Motion”),² and the Court having found and determined that: (i) the Court has jurisdiction to consider the Urgent Motion and the relief

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

requested therein pursuant to section 306 of PROMESA; (ii) venue is proper before this Court pursuant to PROMESA section 307(a); (iii) due and proper notice of this Motion has been provided under the particular circumstances and no other or further notice need be provided; (iv) based on the statements and arguments made in the Motion, the relief requested in the Motion is in the best interest of the Commonwealth and its creditors; (v) any objections to the relief requested in the Motion having been withdrawn or overruled; and (vi) the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein.

Accordingly, it is hereby ORDERED THAT:

1. On or before **April 1, 2019, at 4:00 p.m. (AST)**, the Oversight Board shall provide the Committee with a list containing all Avoidance Actions it will assert prior to the expiration of the applicable statute of limitations period under section 546(a) of the Bankruptcy Code (the “Avoidance Action List”). The Avoidance Action List shall include the names of defendants, the claims to be asserted, and the relief sought in connection with each Avoidance Action listed therein.

2. On or before **4:00 p.m. (AST) on April 5, 2019**, the Committee may file a motion to appoint a trustee under section 926(a) to pursue any cause of action not included on the Avoidance Action List (the “Committee’s Section 926 Motion”).

3. On or before **4:00 p.m. (AST) on April 10, 2019**, the Oversight Board may file an objection to the Committee’s Section 926 Motion.

4. On or before **4:00 p.m. (AST) on April 12, 2019**, the Committee may file a reply in support of the Committee’s Section 926 Motion.

5. A hearing on the Committee's Section 926 Motion is hereby scheduled at [____] (AST) on April [____], 2019 at _____.

6. The Oversight Board's right to oppose the Committee's Section 926 Motion on any basis is preserved.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. The Committee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

9. The Court shall retain exclusive jurisdiction over all matters pertaining to the implementation, interpretation, and enforcement of this Order.

Dated: March ____, 2019

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE